

Daniel Catenacci, M.D.
5841 South Maryland Avenue MC2115
Chicago, IL 60637

Dr. Catenacci's report, *Curriculum Vitae*, and case listing are attached as Exhibit B. Dr. Catenacci is designated as an expert in internal medicine and gastrointestinal oncology. Dr. Catenacci will offer both general and specific causation opinions with regard to decedent that are within the scope of his expertise. Dr. Catenacci bases his opinions on his education, training, experience, case investigation and his research. His opinions will be held to a reasonable degree of certainty within his field of expertise.

Dr. Catenacci may also offer opinions about the reasonableness of decedent's medical bills and necessity of decedent's medical treatment.

Dr. Catenacci charges \$600/hr for chart review, \$750/hr for depositions, and \$7000/day for trial.

Courtney Crim, MD
GlaxoSmithKline, Inc., 5.3317
5 Moore Drive
PO Box 13398
RTP, NC 27709-3398

Dr. Crim's report and *Curriculum Vitae* are attached as Exhibit C. He has not testified in the last five years. Dr. Crim is designated as an expert in pulmonology and is a certified b-reader. Dr. Crim will offer both general and specific causation opinions with regard to decedent having asbestosis. This is within his scope of his expertise. Dr. Crim bases his opinions on his education, training, experience, case investigation and his research. His opinions will be held to a reasonable degree of certainty within his field of expertise.

Dr. Crim charges \$500/hr for chart review and \$750/hr for deposition and trial testimony.

Non-Retained Witnesses with Expertise. There are a number of people in this case who have personal knowledge of facts, but who also have expertise that entitle them to render expert opinion testimony. They include the following treating medical providers and respective custodians of medical and billing records for decedent. Decedent's physicians listed below may testify to their treatment of decedent, decedent's injuries, the cause of decedent's injuries, decedent's ongoing medical needs, decedent's future treatment, and the reasonableness and necessity of the treatment provided to decedent and related medical bills. The custodians of records

may testify to the reasonableness and necessity of decedent's medical care and related medical bills.

Philip Gifford, M.D.
Midland Memorial Hospital
400 Rosalind Redfern
Midland, TX 79701

Jayne McCauley, M.D.
Midland Memorial Hospital
400 Rosalind Redfern
Midland, TX 79701

Cara Bonawitz, M.D.
DX Laboratory
2008 West Ohio
Midland, TX 79701

Phillip Conlin, M.D.
DX Laboratory
2008 West Ohio
Midland, TX 79701

David Sanchez, M.D.
Druanne Mills, RN/FNPC
Alpine Medical Center
202 N. 2nd St.
Alpine, TX 79830

John Paul Schwartz, D.O.
105 E. Oak Street
Marfa, TX 79843

Texas Oncology
Allison Cancer Center
400 Rosalind Redfern Grover Parkway, Ste. 100
Midland, TX 79701

Fort Stockton Nursing Center
501 N. Sycamore St.
Ft. Stockton, TX 79735

Defense Witnesses and Defense Designated Experts. Plaintiff reserves the right to adduce opinion testimony from any of Defendant's witnesses deposed or called to testify in this case and from any expert witnesses designated by any Defendant in this case.

Finally, Plaintiff also reserves the right, subject to agreement with counsel or approval by the Court, to amend this disclosure should other expert witnesses become discoverable or retained hereafter.

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Respectfully submitted,

VICKERY & SHEPHERD, LLP

/s/ Brian B. Winegar

Brian B. Winegar

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Certificate of Service

I hereby certify a true and correct copy of the above and foregoing have been served upon all known counsel of record this the 24th day of August, 2020 by electronic mail, delivery receipt requested to the following counsel of record:

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Houston, TX 77056-1800

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210 E Capitol Street, Suite 2200
Jackson, MS 39201-2375

/s/ Brian B. Winegar
Brian B. Winegar